

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a	§	
BRAZOS LICENSING AND	§	
DEVELOPMENT,	§	
	§	
Plaintiff,	§	Case No. 6:20-cv-580-ADA
	§	Case No. 6:20-cv-585-ADA
v.	§	JURY TRIAL DEMANDED
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

**DECLARATION OF FRANCESCA GERMINARIO IN SUPPORT OF GOOGLE’S
OPPOSITION TO PLAINTIFF’S MOTION TO EXTEND PRETRIAL DEADLINES**

I, Francesca Miki Shima Germinario, hereby declare under 28 U.S.C. § 1746:

1. I am an attorney licensed to practice in the State of California and am an attorney at the law firm of Warren Lex LLP, counsel for Google LLC. I am over the age of 18, have personal knowledge of the matters set forth in this declaration and, if called as a witness, I could and would testify competently to each of them.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff’s Disclosures of Final Infringement Contentions, Case No. 20-580, May 21, 2021. Exhibit 1 contains information designated “Confidential” under the Court’s protective order. Google accordingly files it under seal.

3. Attached hereto as Exhibit 2 is true and correct copy of Plaintiff’s Disclosures of Final Infringement Contentions, Case No. 20-585, May 21, 2021. Exhibit 2 contains

information designated “Confidential” under the Court’s protective order in these matter. Google accordingly files it under seal.

4. Attached hereto as Exhibit 3 is a true and correct copy of WSOU’s First Set of Interrogatories, Case No. 20-580, dated March 29, 2021.

5. Attached hereto as Exhibit 4 is a true and correct copy of WSOU’s First Set of Interrogatories, Case No. 20-585, dated March 29, 2021.

6. Attached hereto as Exhibit 5 are excerpted pages from a true and correct copy of Defendant Google LLC’s Objections and Responses to WSOU’s First Set of Interrogatories (No. 1-7), Case No. 20-580, dated April 28, 2021. Exhibit 5 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

7. Attached hereto as Exhibit 6 are excerpted pages from a true and correct copy of Defendant Google LLC’s Objections and Responses to WSOU’s First Set of Interrogatories (No. 1-7), Case No. 20-585, dated April 28, 2021. Exhibit 6 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

8. Attached hereto as Exhibit 7 is a true and correct copy of WSOU Investments, LLC’s Third Set of Interrogatories to Defendant Google, dated September 15, 2021.

9. Attached hereto as Exhibit 8 is a true and correct copy of Defendant Google LLC’s Objections and Responses to WSOU’s Third Set of Interrogatories (No. 10-15), Case No. 20-580, dated October 15, 2021. Exhibit 8 contains information designated “Restricted

–Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

10. Attached hereto as Exhibit 9 is a true and correct copy of Defendant Google LLC’s Objections and Responses to WSOU's Third Set of Interrogatories (No. 10-15), Case No. 20-585, dated October 15, 2021. Exhibit 9 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

11. Attached hereto as Exhibit 10 is a true and correct copy of WSOU Investments, LLC’s Rule 30(b)(6) Notice of Oral and Videotaped Deposition of Defendant, dated September 2, 2021.

12. Attached hereto as Exhibit 11 is a true and correct copy of Rule 30(b)(6) Notice of Defendant Google LLC, dated September 3, 2021.

13. Attached hereto as Exhibit 12 is a true and correct copy of WSOU Investments, LLC d/b/a Brazos Licensing and Development's Objections to Google LLC's Rule 30(b)(6) Notice of Deposition, dated September 30, 2021. Exhibit 12 contains information designated “Confidential” under the Court’s protective order. Google accordingly files it under seal.

14. Attached hereto as Exhibit 13 is a true and correct copy of Defendant Google LLC’s Objections and Responses to Plaintiff’s Rule 30(b)(6) Notice of Oral and Videotaped Deposition of Defendant, Case Nos. 20-580 and 20-585, dated September 22, 2021. Exhibit 13 contains information designated “Confidential” under the Court’s protective order. Google accordingly files it under seal.

15. Attached hereto as Exhibit 14 is a true and correct copy of a letter from Jennifer Kash to Jim Etheridge, Case No. 20-580, dated September 24, 2021.

16. Attached hereto as Exhibit 15 is a true and correct copy of a letter from Jennifer Kash to Jim Etheridge, Case No. 20-585, dated September 24, 2021.

17. Attached hereto as Exhibit 16 is a true and correct copy of a letter from Nathan Cummings to Jennifer Kash, dated September 27, 2021.

18. Attached hereto as Exhibit 17 is a true and correct copy of a letter from Tracy Stitt to Nathan Cummings, dated September 30, 2021.

19. Attached hereto as Exhibit 18 is a true and correct copy of a letter from Jennifer Kash to Jim Etheridge, dated September 28, 2021.

20. Attached hereto as Exhibit 19 is a true and correct copy of an email from Jim Etheridge to Mike Jones, dated October 5, 2021.

21. Attached hereto as Exhibit 20 is a true and correct copy of an email from Travis Richins to Jennifer Kash, dated November 18, 2021.

22. Attached hereto as Exhibit 21 is a true and correct copy of “2022.01-28 Brazos v. Google Discovery Matrix[97].docx,” attached to the email from Mark Siegmund to Jeffrey Gunnell, Law Clerk to the Honorable Alan D Albright, dated February 11, 2022. Exhibit 21 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

23. Attached hereto as Exhibit 22 is a true and correct copy of an email from Mark Siegmund to Greg Lanier, dated February 11, 2022.

24. Attached hereto as Exhibit 23 are excerpted pages from a true and correct copy of the Transcript of the Deposition of Christiaan Prins, dated January 21, 2022. Exhibit 23 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

25. Attached hereto as Exhibit 24 are excerpted pages from a true and correct copy of the Transcript of the Deposition of Reto Meier, dated February 8, 2022. Exhibit 24 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

26. Attached hereto as Exhibit 25 are excerpted pages from a true and correct copy of the Rough Draft Transcript of the Deposition of Payam Pakzad, dated February 10, 2022. Exhibit 25 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

27. Attached hereto as Exhibit 26 is a true and correct copy of a letter from Erika Warren to WSOU Counsel, dated January 6, 2022.

28. Attached hereto as Exhibit 27 are excerpted pages from a true and correct copy of the Transcript of the Deposition of Wyatt Riley, dated February 1, 2022. Exhibit 27 contains information designated “Restricted –Attorneys’ Eyes Only” under the Court’s protective order. Google accordingly files it under seal.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 16, 2022 in San Francisco, California.



Francesca Miki Shima Germinario